

EXHIBIT "A"

AFFIDAVIT OF ALLAN CARTWRIGHT

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

AFFIDAVIT OF ALLAN CARTWRIGHT

My name is ALLAN CARTWRIGHT. I am over the age of eighteen years, and I am fully competent to give the testimony set forth herein. I have personal knowledge of the facts stated herein and know them to be true.

1.

I am a resident of Los Angeles, California. I am the Assistant Secretary of Church of Scientology International ("CSI"). I have personal knowledge of the facts stated below and, if called upon to testify on such matters, would and could do so competently.

2.

I have been a staff member of CSI from 1987 until 2000, and again from 2006 to the present. I have been a corporate officer of CSI since 2007. I have been a staff member of various Scientology Churches since 1974. As such, I am familiar with the tenets of the Scientology religion, as well as the manner in which CSI accomplishes its religious objectives.

3.

CSI is a non-profit religious corporation incorporated in the State of California, with its principal place of activity in Los Angeles, California. CSI is the "Mother Church" of the Scientology religion.

4.

On October 1, 1993, the United States Internal Revenue Service recognized CSI and all other U.S. Churches of Scientology as churches within the meaning of 26 U.S.C. § 170(c), exempt from taxation as "an organization described in [26 U.S.C.] section 501(c)(3)," i.e., "organized and operated exclusively for religious [and] charitable . . . purposes."

5.

On March 20, 1999, by letter to CSI's President, the I.R.S. "reaffirm[ed]" that the exemption was in good standing and that CSI is "an exclusively charitable and religious organization within the meaning of section 501(c)(3) of the [Internal Revenue] Code."⁶.

Scientology is an applied religion based upon the research, writings and recorded lectures of L. Ron Hubbard, which collectively constitute the Scripture of the religion.

7.

All of Mr. Hubbard's writings and lectures about Scientology are part of the Scripture. This is made clear in numerous church publications. For example, in the book Theology and Practice of a Contemporary Religion, Ch. Four, p. 45, it is stated, "The Scripture of the Scientology religion consists of the writings and recorded spoken words of L. Ron Hubbard on the subjects of Dianetics and Scientology."

8.

This Scripture is the sole source of all the doctrines, tenets, philosophy, practices, rituals and fundamental policies of the Scientology faith. They encompass more than 300 books and other writings, over 3,000 recorded lectures and numerous religious instructional films, totaling over 60 million words.

9.

The doctrine and practices of the Scientology religion are known as Scientology's spiritual or religious "technology." Many of the scriptural writings of Scientology are contained in two multi-volume collections of Mr. Hubbard's writings: The Technical [i.e., Religious] Bulletins of Dianetics and Scientology ("The Technical Bulletins") and The Organization Executive Course ("The OEC").

10.

The Technical Bulletins is comprised of writings by Mr. Hubbard on the methods and procedures for the application of Scientology religious "technology." The OEC contains policy letters and other scriptural writings by Mr. Hubbard concerning the organization and management of all Scientology churches. Mr. Hubbard developed these management and administrative policies specifically to further the enhancement, expansion and dissemination of Scientology. They are an essential component of the religion.

11.

The basic tenet of Scientology is that man is an immortal spiritual being, called a "thetan" (from the Greek letter which symbolizes "thought" or "spirit").

12.

Scientology doctrine states that this spiritual being is inherently good, with potentially infinite capability.

13.

However, thetans have lost their spiritual identity and operate at a small fraction of their native ability.

14.

Scientologists believe that it is only through an exploration of his or her past that one can overcome the negative experiences that are affecting and reducing his or her inherent spiritual ability.

15.

Scientology posits that spiritual renewal and progress can be achieved by participation in Scientology religious practices.

16.

Scientology is a very exact faith. One of its fundamental doctrines is that spiritual freedom can be attained only if the path outlined in the Scripture is followed without deviation. This path starts with the spiritual healing technology found in Dianetics and continues through increasing levels of spiritual enlightenment described throughout the Scientology Scripture. These levels are described in the "Scientology Classification, Gradation and Awareness Chart." See Chart, Exhibit 16 to the Deposition of Robert Wright.

17.

Scientologists refer to this path as "The Bridge to Total Freedom" ("The Bridge").

18.

The core religious services of Scientology are "training" and "auditing," which are designed to advance one's spiritual existence a step at a time by participation in these practices.

19.

Training is provided through Scientology courses at Scientology Churches. Through Scientology Training and study of the Scripture one obtains the wisdom to understand who he is, what he is, where he comes from and his relationship to the universe. Mr. Hubbard is very clear in the Scripture that one-half of the spiritual gains in Scientology come from Training. It is that important.

20.

Most courses are divided into Theory and Practical sections. The Theory course room is arranged for study at tables, with CD playing equipment for tapes, and larger tables for demonstrating principles using clay models. The Practical course rooms do not have CD equipment or clay tables, and so have a different arrangement. Some course rooms are set up for training drills that do not require any tables.

21.

Many course rooms relate to one another, such that as many as five (5) course rooms may be utilized by the students of one class, who migrate from room to room at their own pace during a study period; thus, not all course rooms will be used at any one time, and all course rooms will certainly not be at full capacity within any one time period.

22.

Auditing, also provided at Scientology churches, is a unique form of spiritual counseling. Scientologists believe that ultimate salvation is dependent on increasing one's awareness of his true spiritual identity. Scientologists believe that Spiritual Freedom is a transcendence of the endless cycle of birth to death. Spiritual Freedom in Scientology requires the wisdom acquired through Scientology Training, along with the application of that wisdom through Auditing.

23.

Auditing is ministered by a specially trained individual called an "auditor." An auditor is precisely defined as "one who listens," taken from the Latin audire which means "to hear or listen." Auditing is ministered in confidential one-on-one sessions between an auditor and a parishioner. An auditor is a

minister of the Church of Scientology. Each Scientology church has numerous small Auditing rooms where these counseling sessions take place.

24.

Auditing must be provided in quiet and confidential surroundings, away from other activities that may be going on in the Church.

25.

Auditing is supervised by a trained "Case Supervisor," who must first be trained as an auditor.

26.

The Case Supervisor's role is to see that the Auditing is ministered in a correct orthodox manner.

27.

Scientology churches also hold congregational services on Sundays, religious holidays, and certain other occasions.

28.

Scientology is a hierarchical religion. The ecclesiastical hierarchy is made up of hundreds of churches and missions (the

smallest churches of the religion), which minister Scientology religious services to their parishioners.

29.

Scientology missions reach out into their communities to bring new people into contact with Scientology. Missions minister basic Scientology religious services including the lower levels of Auditing and introductory Training.

30.

Class V churches minister beginning and intermediate religious services and have the authority to train and ordain ministers. These churches are so named because the highest level of Training they provide is designated "Class V" as described on the Bridge to Total Freedom

31.

As the Mother Church of the Scientology religion, CSI's exclusive purposes are to oversee the ministry of religious services and training to Scientology parishioners by the churches and missions of Scientology, to minister religious services and training to staff of Scientology churches, to disseminate the beliefs and practices of Scientology, and to oversee the ecclesiastical administration of all Scientology churches and missions worldwide.

32.

Scientologists believe that the expansion and dissemination of the religion is necessary to salvage human civilization.

33.

All Scientology churches have a religious obligation to reach out to their community to spread the word of Scientology so that new members may pursue the path to spiritual enlightenment.

34.

Scientology churches, therefore, are mandated to include large Public Display areas, including audio-visual presentations on the religion and its social betterment campaigns such as for human rights, drug and alcohol addiction prevention, literacy and scholastic improvement.

35.

CSI has within it several branches organized to ensure the proper and consistent administration of religious organizations within the Scientology hierarchy and the dissemination and expansion of the Scientology religion.

36.

One of CSI's major functions is overseeing the purity of the ministry of religious services within the hierarchy of Scientology churches. CSI staff performing these functions are responsible for the ministry of auditing and training to staff members, for ensuring the purity of the scriptures in the administration of training and auditing to parishioners by churches and missions around the world, for training ministers who provide these religious services to fellow staff and other parishioners and for compiling religious materials from Mr. Hubbard and making them available for use by churches, missions, and parishioners, according to his exact instructions.

37.

CSI's other major function is the ecclesiastical management and administrative support for Scientology churches, missions and groups worldwide.

38.

CSI's staff works to ensure the proper management of such religious organizations in furtherance of the expansion of those groups and the attainment of Scientology's aims. CSI also has responsibility for insuring that Scientology churches, missions and groups in 165 nations provide religious services that are

precisely orthodox and uniform, which is a fundamental requirement of religious doctrine.

39.

Another function performed by CSI is the broad public dissemination of the scriptural works and knowledge of the Founder and the encouragement of parishioners to participate actively in their respective Scientology churches and missions.

40.

Proselytization of the faith is an important part of the Scientology religion. CSI is responsible for seeing that this activity is carried out on an international basis. This includes providing materials and direction to local churches that assist them in reaching out to new members.

41.

CSI fulfills its responsibilities as the Mother Church in many ways, one of which is by implementing a program to turn each Class V Church of Scientology into an "Ideal Central Organization," or, as more commonly known to Scientologists, an "Ideal Org."

42.

This program was the result of extensive study of Mr. Hubbard's writings to determine the exact ecclesiastical requirements for every part of a Scientology Church. This included working out the number of staff members needed and what positions they need to hold. For example, an church having 20 auditors without the needed administrative support staff would not be able to provide Auditing services to the standards mandated in the Scripture.

43.

This study also included the physical requirements for a building to house a Church, which has the requisite number of staff and is able to perform all required ecclesiastical functions. Thus, such a church facility would have to include adequate rooms to house all the different types of auditing and training services, as well as larger areas where new members and potential members could gather to learn about Scientology and

the Church's humanitarian programs.

FURTHER AFFIANT SAITH NOT.


ALLAN CARTWRIGHT

Sworn to and subscribed
before me this 12th
day of December, 2010.

Jeanne S. Reynolds
Notary Public
My Commission Expires:

